

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)

E911 Phase II Automatic Location)
Identification Requirements)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
CC Docket No. 94-102

To: The Wireless Telecommunications Bureau

Comments of the Rural Cellular Association

The Rural Cellular Association ("RCA")¹ submits these comments in response to the Public Notice issued by the Wireless Telecommunications Bureau (WTB) in the above-referenced proceeding.² The WTB seeks additional comment on the implementation of Section 20.18(e) of the Federal Communications Commission's Rules³ pertaining to the provision of enhanced 911 (E911) services. Section 20.18(e) requires cellular carriers, among others, to provide the location of a 911 call by latitude and longitude accurate to 125 meters using a Root Mean Square (RMS) methodology.

RCA consistently has emphasized that E911 solutions should be technologically neutral because a single technological approach will not work in all markets. As RCA previously noted, for

¹ RCA is an association of telecommunications companies providing commercial mobile radio services, including cellular and broadband personal communications service ("PCS"), to more than 100 rural and small metropolitan markets, encompassing approximately 13 million people.

² DA 99-1049, released June 1, 1999.

³ 47 C.F.R. §20.18(e).

example, triangulation methodologies, which generally are required for network-based solutions, may not be feasible in many rural markets. The recognition of significant implementation problems and the possibility of alternative solutions that has led the WTB to issue this latest request for comments supports RCA's position that the Commission's E911 standard should be technologically neutral.

At the time Section 20.18(e) was being considered, RCA argued that the FCC should not dictate or limit the technological solution for E911 implementation because one technological approach would not accommodate all service areas and all carrier situations. RCA has documented the special problems of implementing E911 in rural areas.⁴ Because the technical solutions for Phase II E911 implementation were unsettled, RCA questioned the efficacy of mandating a single technological approach.⁵ It is clear from this latest request for further comment and information regarding E911

⁴/ See Comments of the Rural Cellular Association, filed January 9, 1995, and Reply Comments of the Rural Cellular Association, filed March 17, 1995, In the Matter of Revision of the Commission's Rules to ensure compatibility with enhanced 911 emergency calling systems, CC Docket No. 94-102; and Comments of the Rural Cellular Association In the Matter of Petition for Rulemaking of the Ad Hoc Alliance for Public Access to 911, CC Docket No. 94-102, filed December 15, 1995.

⁵ Despite complaints that the October 1, 2001 deadline for implementation of Automatic Location Identification (ALI) as well as the standard of accuracy required (including the standard for measuring accuracy) were not feasible for carriers using handset-based technology, the Commission held firm to its E911 implementation schedule. Memorandum and Order, Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling System, CC Docket No. 94-102, RM-8143, 12 FCC Rcd. 22665, 22722 (1997) ("Reconsideration Order").

implementation through handset-based technological solutions that the WTB recognizes RCA's concerns.

RCA supports the WTB's efforts to address the real world technological challenges to implementing Phase II E911. This latest effort to consider affording greater flexibility to carriers with respect to E911 Phase II requirements constitutes prudent recognition of technological developments which may lead to more effective and efficient implementation of public interest policy goals.

While RCA does not favor one approach or one manufacturer over another, it fully supports the Commission's recognition of the need for a reasonable and flexible approach to achieving Phase II capability, taking into account current technological realities. In its consideration of standards for handset-based solutions, RCA urges the Commission to evaluate closely the benefits associated allowing carriers to choose a methodology which is compatible with its existing system and market. The availability of a choice, however, must be meaningful; implementation standards⁶ adopted should not penalize a carrier for its choice. Accordingly, suggestions that a trade-off of earlier implementation and greater accuracy for phased implementation should be evaluated to ensure that the principles of technological neutrality are maintained.

In evaluating the choice among technologies, carriers will also be considering the costs associated with handset replacement.

⁶ Accuracy standards apply more directly to manufacturers than carriers -- adoption of particularly stringent standards would disqualify certain systems.

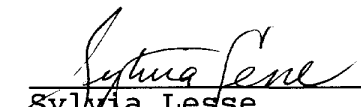
Replacing or retrofitting handsets is relatively more expensive for smaller carriers who do not enjoy the discounts that suppliers generally reserve for bulk purchases. It is therefore critical that the Commission take into account the relative hardships (and associated competitive disadvantage) which smaller carriers will encounter if faced with penalizing replacement/retrofit requirements.

RCA has consistently advocated the development of flexible regulatory approaches which can accommodate and capitalize on a dynamic technological environment. The efficacy of that approach is exemplified by the Commission's experience with 911/E911 implementation. It is clear that regulations intended to promote public safety interests must be technologically and economically sound in order to ensure that policy goals will be realized and that the public interest will be served.

Respectfully submitted,

THE RURAL CELLULAR ASSOCIATION

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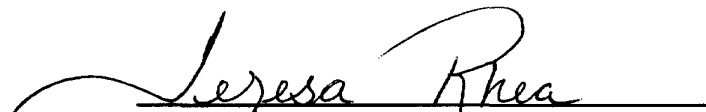
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June 17, 1999

CERTIFICATE OF SERVICE

I, Teresa Rhea, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC 20037, hereby certify that a copy of the foregoing Comments of the Rural Cellular Association was served on this 17th day of June, 1999, by hand delivery to the following parties:


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